

ORIGINAL

Stanton, Y.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
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DATE FILED: 12/9/16

DONALD P. BOLAND and MARY A. BOLAND, :
Individually and on Behalf of All Others Similarly : 16 Civ. 3925 (LLS)
Situated,

Plaintiffs, : ECF Case

v.

GERDAU S.A., et al.,

Defendants. : STIPULATION AND [PROPOSED] ORDER EXTENDING TIME

LLS

WHEREAS, on May 26, 2016, plaintiffs Donald P. Boland and Mary A. Boland filed the above-captioned proposed class action against Gerdau S.A. ("Gerdau") and multiple individual defendants; and

WHEREAS, Policemen's Annuity and Benefit Fund of Chicago ("Lead Plaintiff") was appointed Lead Plaintiff on August 9, 2016; and

WHEREAS, pursuant to an agreed-upon schedule approved by the Court (see Dkt. Nos. 8, 25), Lead Plaintiff filed a 110-page, 379-paragraph Amended Complaint on October 31, 2016; and

WHEREAS, Gerdau's motion to dismiss the Amended Complaint is currently due to be filed on December 30, 2016; and

WHEREAS, counsel for Lead Plaintiff and counsel for Gerdau have met and conferred regarding the scheduling of Gerdau's motion to dismiss, Lead Plaintiff's opposition to that motion, and Gerdau's reply to that opposition; and

WHEREAS, counsel for Gerdau has not previously requested an extension of time with respect to the filing of Gerdau's motion to dismiss.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the parties, that:

1. Gerdau shall have until January 17, 2017 to move to dismiss the Amended Complaint;

2. Lead Plaintiff shall have until ~~March~~ 17, 2017 to file an opposition to Gerdau's motion to dismiss; and

3. Gerdau shall have until ~~April~~ 17, 2017 to file a reply to Lead Plaintiff's opposition.

Dated: December 8, 2016
New York, New York

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February

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Lead Counsel for Lead Plaintiff

SO ORDERED:

Dated: December 9, 2016
New York, New York

Louis L. Stanton
U.S.D.J.

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